

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	<b>:</b>	<b>CHAPTER 13</b>
<b>JEFFREY LYNN GOSS</b>	<b>:</b>	
<b>Debtor</b>	<b>:</b>	<b>CASE NO. 4:18-bk-04257</b>
	<b>:</b>	
<b>JPMORGAN CHASE BANK,</b>	<b>:</b>	
<b>NATIONAL ASSOCIATION,</b>	<b>:</b>	
<b>Movant</b>	<b>:</b>	
	<b>:</b>	
<b>v.</b>	<b>:</b>	
	<b>:</b>	
<b>JEFFREY LYNN GOSS,</b>	<b>:</b>	
<b>Respondent</b>	<b>:</b>	
	<b>:</b>	
<b>JACK N. ZAHAROPOULOS, Trustee</b>	<b>:</b>	
<b>Additional Respondent</b>	<b>:</b>	

**ANSWER TO MOTION FOR RELIEF FROM STAY**

1. Admitted.
2. Admitted that Movant is the holder of a secured claim against the Debtor. Proof that the mortgage is secured only by the Debtor's principal residence is demanded at trial and this averment is therefore denied..
3. Admitted that the filing of a bankruptcy petition acts as a stay upon certain foreclosure actions. Denied that Movant is entitled to relief from the automatic stay.
4. Admitted.
5. Admitted.
6. Proof of the amount of the default is demanded at trial and this paragraph is therefore denied.
7. Proof of the amount of the default is demanded at trial and this paragraph is therefore denied.
8. Admitted as to the value of the property. Proof of amount owed to Movant is demanded at trial and this paragraph is therefore denied.

9. Proof that Movant will suffer irreparable harm is demanded at trial and this paragraph is therefore denied.
  - a. Denied that Movant lacks adequate protection. Movant asserts that the value of the collateral is \$695,200.00 and that its claim is \$93,599.35. Movant is therefore protected by a large equity cushion.
  - b. Denied. Based on the claims filed by the first and second mortgagee and on the asserted value of the collateral, the Debtor has more than \$464,000 in equity in the property.
  - c. Denied. The property is the Debtor's home and is essential to the reorganization.
10. Denied that Rule 4001(a)(3) should not be applicable and denied that the Movant should be allowed to immediately enforce and implement the Order granting relief from the automatic stay because the Movant is more than adequately protected by the equity in the property.
11. Admitted on information and belief in Movant's representations.
12. Denied that Movant has demonstrated cause for relief from stay

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Dorothy L. Mott

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